

Two Tower Center Blvd.
10th Floor
East Brunswick, New Jersey 08816


CHEMICAL LAND HOLDINGS, INC.

September 13, 2000

U.S. Environmental Protection Agency, Region II
Emergency and Remedial Response Division
290 Broadway, 19th Floor, Room W-20
New York, NY 10007-1866

RECEIVED

SEP 14 2000

CHEMICAL LAND HOLDINGS, INC.

Attention: Ms. Janet Conetta
Strategic Integration Manager

Subject: Evaluation of BioGenesis Soil Washing Technology
Meeting Number 1
Passaic River Study Area
Administrative Order on Consent Index No. II-CERCLA-0117

Dear Ms. Conetta:

The Weston/BioGenesis (BGW) process appears to have some potential to be able to treat sediments contaminated with a variety of chemicals. However, as we learned from the BGW report "BioGenesisSM Sediment Washing Technology Full-Scale, 40 Cy/Hr, Sediment Decontamination Facility for the NY/NJ Harbor, Final Report on the Pilot Demonstration Project," December 1999, BioGenesis Enterprises, Inc. and Roy F. Weston, Inc. and our meeting between EPA and the BGW team, the actual performance capabilities and costs associated with the process are not yet fully determined. This final determination is scheduled to be completed under the WRDA demonstration program when the full-scale facility is constructed and operational in 2002.

The performance capability of the BGW process and the costs associated with treating sediments characteristic of the Passaic River 6-mile Study Area are also undetermined. Rather than wait until sometime in 2002 to process Passaic River Study Area sediments in the new full-scale facility to test the system's performance, it is more reasonable to conduct bench-scale, and possibly pilot scale tests sooner. Towards this end, we need to perform the action items agreed-to during our meeting, and move forward through a second, technical meeting, and into bench-scale testing, as appropriate.

At the conclusion of our meeting we agreed to the following action items (reference Meeting Notes, submitted September 7, 2000):

1. CLH will prepare and distribute meeting notes to EPA (Conetta, Stern).
2. CLH will prepare CDs with the 1995 RI data and distribute to Jones, Amiran, Sontag, Stern.
3. CLH will develop a set of written questions to submit to BGW as a follow-up to the meeting and review of additional materials (see BGW action items).
4. CLH will collect a sediment sample and submit ~5gals to BioGenesis for a preliminary

838060001

J. Conetta

Evaluation of BioGenesis Soil Washing Technology - Meeting Number 1

September 13, 2000

Page 2

evaluation to determine if they believe they can successfully treat the Passaic River Study Area sediments.

5. BGW will do a preliminary evaluation of the sediment provided by CLH, and submit an evaluation report describing qualitative physical characteristics.
6. BGW will provide summary data to CLH from the demonstration processing of sediment from their Japanese client's site (no locations, only influent/effluent and other performance data).
7. BGW will provide results of tests conducted at other sites.
8. CLH/EPA will schedule another meeting to discuss BGW's data and CLH's questions (Stern/Firstenberg).
9. BGW, CLH, and EPA will develop a plan for bench-scale treatability tests, specifically for the BGW technology.

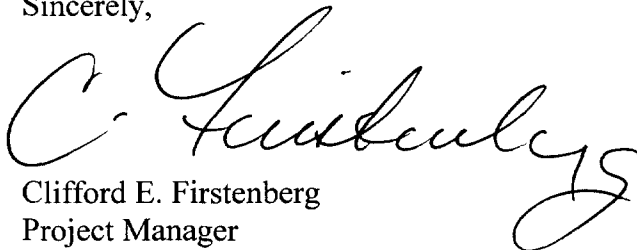
Item 1 has been completed, items 2-3 are in process (item 3 can not be completed until CLH receives additional information from BGW), and I need to coordinate with Dr. Amiran regarding item 4.

Items 5-7 are BGW's, and item 5 is dependent upon CLH's coordination with, and providing sediment to BGW.

I request that CLH be provided with the data listed in items 6 and 7 as soon as possible, so CLH can evaluate, and then work with EPA to schedule our next meeting.

In addition, since it is likely that some level of treatability testing will be necessary to evaluate the BGW process (performance and cost estimate) on Passaic River Study Area sediments, CLH is developing a treatability testing work plan, specifically for the BGW technology (according to the AOC Statement of Work, FS task 4.b.1) for submittal to the Agency for review/comment.

Sincerely,



Clifford E. Firstenberg

Project Manager

On behalf of Occidental Chemical Corporation

(as successor to Diamond Shamrock Chemicals Company)

enclosure

(2 copies sent)

838060002

J. Conetta

Evaluation of BioGenesis Soil Washing Technology - Meeting Number 1

September 13, 2000

Page 3

- 2c: Section Chief
NJDEP-Bureau of Federal Case Management
401 East State Street - CN 028
Trenton, NJ 08625-0028
Attn: Jonathan D. Berg
- 1c: Chief, New Jersey Superfund Branch
Office of Regional Counsel
U.S. Environmental Protection Agency
290 Broadway, 19th Floor, Room W-20
New York, NY 10007-1866
Attention: Diamond Alkali Site Attorney - Passaic River Study Area
- 1c: U.S. Environmental Protection Agency, Region II
Sediment Decontamination Program
290 Broadway
New York, NY 10007-1866
Attention: Eric A. Stern
- 1c: Roy F. Weston, Inc.
1400 Weston Way
P.O. Box 2653
West Chester, PA 19380
Attention: John G. Sontag Jr. P. E.

838060003